

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MILAGROS FONSECA SOLA

DEBTOR

CASE NO 11-07162-BKT

CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, MILAGROS FONSECA SOLA, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated May 22, 2015, herewith and attached to this motion.
2. This Plan modification is filed to increase the "Proposed Base" of the Plan from \$17,520.00 to \$18,120.00, in order to provide for the 2012 tax refund (\$261) and 2013 partial tax refund (\$313).

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

Page -2-
Post confirmation modification of chapter 13 Plan
Case no. 11-07162-BKT13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of May, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 11-07162-13

FONSECA SOLA, MILAGROS

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 5/22/2015

☐ AMENDED PLAN DATED: _____

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 220.00 x 12 = \$ 2,640.00
 \$ 280.00 x 42 = \$ 11,760.00
 \$ 620.00 x 6 = \$ 3,720.00
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____

TOTAL: \$ 18,120.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
 within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
 addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 18,120.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
 Disclosure Statement: \$ 2,904.00

Signed: _____

Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. BANCO POPULAR D Cr. POPULAR AUTO Cr. See Attached

Claim no. 6-2 # Claim 2-1 # _____
 \$ 3,057.57 \$ 1,247.18 \$ _____

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. _____ Cr. _____ Cr. _____
 # _____ # _____ # _____
 \$ _____ \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
 # _____ # _____ # _____
 \$ _____ \$ _____ \$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

BANCO POPULAR D POPULAR AUTO

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
 # _____ # _____ # _____
 \$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

* Additional Attorney's Fees: \$500.00 payment for the services rendered in connection to debtor(s)' post confirmation plan and related procedures for approval, pursuant to R. 2016 (f)(3).

* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."

"Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.

Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

IN RE FONSECA SOLA, MILAGROS

Case No. 11-07162-13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

	Cr	#	\$
Trustee pays secured ARREARS:	POPULAR AUTO	Claim 7-1	1,108.00
	POPULAR AUTO	x0002 Post-petition	3,531.73

Label Matrix for local noticing
104-3
Case 11-07162-BKT13
District of Puerto Rico
San Juan
at May 23 11:42:00 AST 2015

BACK BOWL I LLC SERIES B
WEINSTEIN & RILEY P S
2001 WESTERN AVE SUITE 400
SEATTLE, WA 98121-3132

BACK BOWL I LLC SERIES C
WEINSTEIN & RILEY P S
2001 WESTERN AVE SUITE 400
SEATTLE, WA 98121-3132

ANCO POPULAR PR
MARTINEZ & TORRES LAW OFFICES PSC
PO BOX 71375
SAN JUAN, PR 00936-8475

MIDLAND FUNDING LLC BY AMERICAN INFOSOURCE L
ATTN DEPARTMENT 1
PO BOX 4457
HOUSTON, TX 77210-4457

MIDLAND FUNDING LLC/RECOSER LLC
25 SE 2ND AVE STE 1120
MIAMI, FL 33131-1605

POPULAR AUTO
PO BOX 366818
SAN JUAN, PR 00936-6818

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

AEGPR
PO BOX 364508
SAN JUAN, PR 00936-4508

ANCO POPULAR DE PR
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SAN JUAN, PR 00936-8100

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BANCO SANTANDER
PO BOX 362589
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Back Bowl I LLC, Series B
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

Back Bowl I LLC, Series C
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

EOS CCA
MONITRONICS
700 LONGWATER DR
NORWELL, MA 02061-1624

Capital Retail Bank
c/o Recovery Management Systems Corp
5 SE 2nd Ave Suite 1120
Miami FL 33131-1605

ISLAND FINANCE
PO BOX 195369
SAN JUAN, PR 00919-5369

Midland Funding LLC
by American InfoSource LP as agent
PO Box 4457
Houston, TX 77210-4457

POPULAR AUTO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PUERTO RICO 00936-6818

POPULAR AUTO
PO BOX 15011
SAN JUAN, PR 00902-8511

Portfolio Investments I LLC
c/o Recovery Management Systems Corp
25 SE 2nd Avenue Suite 1120
Miami, FL 33131-1605

Recovery Management Systems Corporation
5 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

SANTANDER FINANCIAL D/B/A ISLAND FINANCE
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WALMART
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ATLANTA, GA 30353-0927

JOSE RAMON CARRION MORALES
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MILAGROS FONSECA SOLA
CONDADO MODERNO
R12 15 STREET
CAGUAS, PR 00725-2447

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
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SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

End of Label Matrix
Mailable recipients 27
Bypassed recipients 0
Total 27